

Item	Page(s)/Section(s)	Phrase	Change Discussion	Suggested Change(s)
1	<p>Various (see below)</p> <p>Page A1/SRP-LR Table 3.0-1</p> <p>Page A-2/(3) 1st indented paragraph, 4th sentence.</p> <p>Page A-4/(6) SRP-LR Table A.1-1, item 10, last sentence under Description.</p> <p>Page A-5/A.4.1, 1st partial sentence on page.</p>	<p>The phrase "or can be improved" occurring in several slightly different sentences. (see below, phrase is underlined in each example)</p> <p>".... when the review of operating experience indicates that the programs may not be full effective <u>or can be improved</u>.</p> <p>"When these reviews indicate that the programs may not be fully effective <u>or can be improved</u>, the AMPs"</p> <p>".....when the review of operating experience indicates that the AMP may not be fully effective <u>or can be improved</u>."</p> <p>"When the evaluation of operating experience</p>	<p>We recommend deleting the phrase at the end of the sentence that reads: "or can be improved." This phrase is open-ended and very subjective. "Can be improved" can mean anything from correction of typographical errors, standard format fonts to more substantial comments. In addition, OE is a program that is designed to incorporate lessons learned and not enhance programs or procedures just because they can be enhanced. For example: Performing volumetric examinations instead of visual examinations could enhance a program but if the existing program is effective in managing the aging effects through visual examinations, it would be unnecessary and burdensome to require different examination techniques.</p>	<p>Suggestions for each occurrence below:</p> <p>The programs are either enhanced or new programs are developed when the review of operating experience indicates that the programs may not be full effective.</p> <p>When these reviews indicate that the programs may not be fully effective, the AMPs are enhanced or new AMPs are developed and implemented as appropriate.</p> <p>The AMP is either enhanced or new AMPs are developed when the review of operating experience indicates that the AMP may not be fully effective.</p>

	<p>Page A-6/A-4.1(6) Table item 10, Last Paragraph, last sentence.</p> <p>Page A-7/A-4.1(10), 1st sentence (sentence begins on page A-6)</p>	<p>information indicates that the AMPs may not be fully effective <u>or can be improved</u>, the AMPs...”</p> <p>“...when the review of operating experience indicates that the AMP may not be full effective <u>or can be improved</u>.”</p> <p>“...information indicates that the AMPs may not be fully effective or can be improved, the AMPs are either enhanced or new AMPs are developed as appropriate.”</p>		<p>When the evaluation of operating experience information indicates that the AMPs may not be fully effective, the AMPs are enhanced or new AMPs are developed and implemented as appropriate.</p> <p>“...when the review of operating experience indicates that the AMP may not be full effective.”</p> <p>“...information indicates that the AMPs may not be fully effective, the AMPs are either enhanced or new AMPs are developed as appropriate.”</p>
2	Page A-5/ 1 st paragraph, 1 st bullet, 2 nd sentence	“For example, the processes appropriately gather information on all the license renewal structures and components...”	The use of both “appropriately” and “all” in this sentence can be confused to mean that SSC information may not be representative of other components and therefore this information could not be applied to similar components. The result would be an increase in gathering the information for each component. Since we do not believe this is appropriate, nor do we believe	“For example, the processes appropriately gather information on the license renewal structures and components...”

			<p>this is what is meant we suggest that the word "appropriately" remain and the word "all" be deleted from the sentence.</p>	
3	<p>Page A-5/ 1st paragraph, 2nd bullet</p>	<p>"While the programs and procedures may specify reviews of certain sources of information, such as NRC generic communications and Institute of Nuclear Power Operations reports, they include any potential source of relevant plant-specific or industry operating experience information"</p>	<p>The phrase "any potential source of relevant plant-specific or industry operating experience information" is too generic and is subjective. Existing plant programs specify what constitutes operating experience and what information should be reviewed for incorporation into the AMPs. This phrase can be interpreted to believe that NRC is interested in additional information being reviewed for incorporation into AMPs or that the existing definitions of what constitutes operating experience should be expanded. If NRC believes that the current items that are reviewed as operating experience should be expanded, regulatory guidance should be issued to backfit a new definition; which may require INPO involvement since plants follow the INPO OE Guidelines.</p>	<p>We recommend a deletion of bullet 2 or a total rewrite that clarifies that the existing definitions of what constitutes OE remain sufficient.</p>
4	<p>Draft ISG LR-ISG-2011-05 Page 3, 4th paragraph, 4th sentence</p>	<p>"However, the NRC staff's intent is for applicants to obligate themselves to review operating experience</p>	<p>The draft ISG acknowledges the appropriateness of using generic plant operating experience review activities to identify areas where AMPs may need</p>	<p>"In this regard, the staff believes that guidance on the ongoing review of operating experience for</p>

	<p>(also inserted into GALL Chapters X and XI)</p> <p>A-6/A.4.1(9), indented sentence</p> <p>Page A-7/1st bullet, 3rd sentence</p>	<p>on an ongoing basis as part of implementing their AMPs....”</p> <p>“As discussed in Appendix B of the GALL Report, the ongoing effectiveness of the program is ensured through the systematic review of both plant-specific and industry operating experience.”</p> <p>“In addition, the processes include the AMPs credited for managing the effects of aging, and the activities under three AMPs (e.g., inspection methods, preventive actions, evaluation techniques, etc.).</p>	<p>enhanced or new AMPs may be needed. Although the industry completely agrees with this intent, some of the language could be interpreted to imply an expectation to perform additional, discrete operating experience reviews on an AMP by AMP basis rather than ensuring that the operating experience reviews are performed as part of the existing programs. This type of wording is listed in the Phrase column. We suggest that NRC replace this language with the language that is listed on page 4 of the draft ISG (see suggest change column). We believe this wording better describes NRC’s objective and should be used throughout the document.</p>	<p>license renewal should be addressed as a generic process that is used to inform each AMP and, when necessary, to develop new AMPs.” (Draft ISG, page 4, 2nd full paragraph, 4th sentence)</p>
5	<p>Draft LR-ISG-2011-05/“Basis for Issuing Interim Guidance” section, Page 4, last sentence of 1st partial paragraph and last sentence of 1st full paragraph.</p>	<p>“This LR-ISG provides an example of such a summary description....”</p> <p>and</p> <p>“...this obligation is captured in the example FSAR supplement summary description....”</p>	<p>Item (7) of Appendix A provides a proposed insert for the SRP-LR, and Item (10) of Appendix A provides an insert for the GALL report. These proposed inserts, while slightly different from each other, both provide a description of the new expectations for ongoing use of operating experience. However, the Draft LR-ISG does not provide an actual example of an FSAR</p>	<p>We recommend that either NRC provides an example as indicated or the text be revised to indicate that the FSAR summary description be developed based on the guidance proved in Appendix A, Items (7) and (10) inserts for the SRP-LR and GALL. It is also</p>

			summary description"	recommended that NRC review these inserts and make them consistent.
6	Page A-4/Item 7, 1 st sentence	"Insert in the SRP-LR a new Appendix A.4, "Operating Experience for Aging Management Programs."...	Clarify if this statement means that this is new guidance is a Branch Technical Position or if SRP-LR Appendix A is being changed to include more than just Branch Technical Positions.	No specific recommendations other than to provide clarification as requested.

In addition to the above table, we would like to understand how NRC intends to accomplish their review of the OE program relative to the new SRP Appendix A.4 (i.e. RAIs, AMP audits) and how much additional information is required to be in the application to satisfy the SRP?

Please explain the following statement from recent RAIs "However, the staff believes that the content of the document, not the source is the most important consideration." Industry does not believe (and it is not in accordance with current OE programs) that all documents, regardless of their source, are OE for all plants. However, we do agree that guidance issued through the appropriate generic communications process would be considered OE (as in accordance with LIC-503, Management Directive 8.8).

Given that the timeliness of OE evaluations is currently addressed in IP 71152, what (if any) changes does the Staff believe is needed regarding timeliness and what would that acceptance criteria look like?